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**From:** dwresilience [dwresilience@epa.gov]  
**Sent:** 3/27/2020 1:18:52 PM  
**To:** Deason, Ken [Deason.Ken@epa.gov]; Robert Wilson [Bob.Wilson@cityutilities.net]; dwresilience [dwresilience@epa.gov]  
**CC:** todd.eichholz@dnr.mo.gov; Hernandez-Santiago, Neftali [Hernandez-Santiago.Neftali@epa.gov]; Mindrup, Mary [Mindrup.Mary@epa.gov]  
**Subject:** RE: City Utilities of Springfield, MO - Request for an extension of AWIA ERP Compliance Deadline  
**Attachments:** Memorandum on COVID-19 Implications for EPAs Enforcement and Compliance Assurance Program (March 26, 2020).pdf

You inquired if the March 31, 2020 risk and resilience assessment certification deadline could be extended.

Please be advised that if a community water system does not certify it has conducted the required risk and resilience assessment or emergency response plan preparation or its revisions by the applicable deadlines set in Section 1433 of the Safe Drinking Water Act (SDWA) / Section 2013 of America's Water Infrastructure Act, **the EPA has enforcement discretion** in terms of how it responds to such noncompliance under Section 1414 of SDWA, please see the attached memo for more guidance on this matter.

Please let us know if you have any questions and stay healthy.

Thank you.

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**From:** Deason, Ken <Deason.Ken@epa.gov>  
**Sent:** Wednesday, March 25, 2020 12:23 PM  
**To:** Robert Wilson <Bob.Wilson@cityutilities.net>; dwresilience <dwresilience@epa.gov>  
**Cc:** todd.eichholz@dnr.mo.gov; Hernandez-Santiago, Neftali <Hernandez-Santiago.Neftali@epa.gov>; Mindrup, Mary <Mindrup.Mary@epa.gov>  
**Subject:** RE: City Utilities of Springfield, MO - Request for an extension of AWIA ERP Compliance Deadline

Thank you for your inquiry – decisions regarding extensions are being made by the Water Security Division (WSD) at Headquarters.

Contact for this AWIA requirements is Curt Baranowski. He can be reached through the email at [dwresilience@epa.gov](mailto:dwresilience@epa.gov).

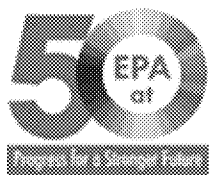
Please refer to this email account for all inquiries and requests. I see that you addressed this email account in your email.

You should receive information from the WSD on this subject.

Thank you again for your inquiry.

Ken

**Ken Deason, Geologist PG**  
US EPA, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219



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**From:** Robert Wilson <[Bob.Wilson@cityutilities.net](mailto:Bob.Wilson@cityutilities.net)>

**Sent:** Wednesday, March 25, 2020 11:12 AM

**To:** Deason, Ken <[Deason.Ken@epa.gov](mailto:Deason.Ken@epa.gov)>; dwresilience <[dwresilience@epa.gov](mailto:dwresilience@epa.gov)>

**Cc:** [todd.eichholz@dnr.mo.gov](mailto:todd.eichholz@dnr.mo.gov); Hernandez-Santiago, Neftali <[Hernandez-Santiago.Neftali@epa.gov](mailto:Hernandez-Santiago.Neftali@epa.gov)>

**Subject:** City Utilities of Springfield, MO - Request for an extension of AWIA ERP Compliance Deadline

Mr. Deason,

City Utilities of Springfield, Missouri (CU), Water System ID MO5010754, is requesting an extension of the deadline to submit its Water Utility Emergency Response Plan (ERP) required by America's Water Infrastructure Act of 2018 (AWIA). CU anticipates certifying its Risk and Resilience Assessment (RRA) to EPA by the required March 31, 2020 deadline for utilities serving more than 100,000 people. However due to changes in operation and staffing necessitated by the COVID-19 pandemic, CU does not anticipate being able to complete its ERP within six months of certifying its RRA which would be approximately September 30, 2020. Based on current understanding of the nature and potential duration of the pandemic response, CU is requesting an additional three months to complete its ERP with a new certification deadline of December 31, 2020. If the pandemic event continues for longer than anticipated, CU may request additional time beyond this request. It is CU's intent to comply with the requirements of AWIA while first ensuring the supply, treatment, and distribution of safe drinking water to our customers. We appreciate your consideration of this request as we work to safely and responsibly serve our customers during this unprecedented situation.

Thank you for your consideration of this request.

Bob Wilson  
Director-Water Operations  
O: 417.831.8880



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